Meeting Minutes Transmittal

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Federal Building, Room 784B
Richland, Washington

November 4, 1993
2:30 p.m. - 4:30 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting.

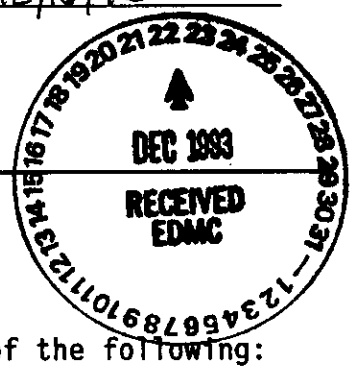
RC Bowman for _____ Date: 12/16/93
Clifford E. Clark, Unit Manager, RL
(Represented by Roger C. Bowman, WHC)

Don Sauvageau for DJ Duncan per telecon Date: 12-16-93
Daniel L. Duncan, RCRA Program Manager, EPA Region 10

Alisa D. Huckaby _____ Date: 12-16-93
Alisa D. Huckaby, Unit Manager, Washington State Department of Ecology

224-T Transuranic Waste Storage and Assay Facility, WHC Concurrence

_____ Date: 12/16/93
Richard D. Pierce, Contractor Representative, WHC



Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:
Attachment 1 - Agenda
Attachment 2 - Summary of Discussion and Commitments/Agreements
Attachment 3 - Attendance List
Attachment 4 - Action Items
Attachment 5 - 224-T Transuranic Waste Storage and Assay Facility, Container Management Practices

Distribution:

M. R. Aichele	WHC	T4-04
B. A. Austin	WHC	B2-35
J. K. Bartz	MACTEC	B1-42
R. C. Bowman	WHC	H6-24
B. J. Broomfield	WHC	T3-04
R. C. Brunke	WHC	H6-23
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
D. L. Duncan	EPA	HW-106
T. L. Erickson	WHC	N3-13
R. M. Gordon	RL	R3-80
K. L. Hladek	WHC	N3-13
A. D. Huckaby	Ecology	BS-18
M. N. Jaraysi	Ecology	BS-18
M. J. La Barge	WHC	H6-30
S. J. Lijek	MACTEC	B1-42
D. W. Lloyd	MACTEC	B1-42
P. J. Mackey	WHC	B3-15
M. M. McCarthy	WHC	N3-13
K. M. McDonald	WHC	T4-03
R. D. Pierce	WHC	T3-04
D. B. Powell	WHC	T4-03
S. M. Price	WHC	H6-23
R. J. Roberts	WHC	N3-13
D. G. Saueressig	WHC	H6-24
N. M. Shoemaker	WHC	T4-04
R. W. Szelmeczka	WHC	T4-06
S. A. Szendre	WHC	H6-30
H. T. Tilden II	PNL	P7-68

ADMINISTRATIVE RECORD: 224-T Transuranic Waste Storage and Assay Facility, S-2-2 [Care of EPIC, WHC (H6-08)]

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Please send comments on distribution list to K. E. Knox, WHC H6-24, (509) 372-3596

Attachment 1

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Video Conference Room (784-B)
Federal Building
Richland, Washington

November 4, 1993
2:30 p.m. - 4:30 p.m.

Agenda

1. INTRODUCTIONS
2. MEETING MINUTES
3. STATUS OF PERMIT APPLICATION
4. GENERAL TOPICS
   - PRESENTATION ON CONTAINER MANAGEMENT
   - PART A PERMIT APPLICATION DISCREPANCIES
   - SEALING FLOOR AT THE 224-T TRUSAF
   - BACKLOG WASTE AT THE 224-T TRUSAF
   - SEISMIC UPGRADES AND PIPING UNDER THE UNIT
   - PROCESS CELLS IN THE 224-T TRUSAF
5. SET NEXT MEETING DATE

Attachment 2

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Video Conference Room (784-B)
Federal Building
Richland, Washington

November 4, 1993
2:30 p.m. - 4:30 p.m.

Summary of Discussion and Commitments/Agreements

1. INTRODUCTIONS

Mr. D. Saueressig (WHC) opened the 224-T Transuranic Waste Storage and Assay Facility (224-T TRUSAF) Unit Managers Meeting (UMM) with introductions.

2. MEETING MINUTES

Mr. Saueressig stated that the November 4, 1993 minutes would be provided either for review or approval and signature at the next UMM.

3. STATUS OF PERMIT APPLICATION

Ms. A. Huckaby (Ecology) reported that she was currently reviewing Chapter 3 of the permit application. Ms. Huckaby stated that Mr. D. Duncan (EPA) will have the responsibility for reviewing the land disposal restriction information contained in the permit application. Ms. Huckaby stated that she planned to complete her review of the permit application by the first part of December 1993; however, due to internal review of the draft Notice of Deficiency (NOD) at Lacey, Washington, submittal to RL/WHC of the NOD may delayed.

4. GENERAL TOPICS

- **Presentation on Container Management**

Mr. Saueressig distributed a handout (Attachment 5) and gave a presentation regarding container management at 224-T TRUSAF. Ms. Huckaby inquired about the definition of "administratively processed", stating that she could not find a clear definition in the permit application. Ms. Huckaby also stated that the permit application does not describe a process to be followed if waste has been accepted but cannot be certified.

Mr. R. Szelmeczka (WHC) addressed Ms. Huckaby's questions by describing the options for handling noncertifiable waste. If the waste being handled is mixed waste and the 90-day storage limit has expired, then the waste cannot be shipped back to the generator, and generally WHC would store it as noncertifiable

waste to be repackaged. If the waste being handled is transuranic (TRU) waste only, then it can be sent back to the generator for repackaging.

Mr. Szelmeczka then explained that administrative process refers to the overall process of tracking the waste and storing it, and pointed out that there is no physical processing or treating of the waste. Ms. Huckaby stated the lack of a definition of administrative process would be noted as a notice of deficiency (NOD).

Ms. Huckaby inquired about the TRU retrieval pilot project and how the waste will be managed in relation to TRUSAF. Mr. Szelmeczka took an action to provide an overview of the retrieval pilot project at the next UMM.

- **Part A Permit Application Discrepancies**

Ms. Huckaby indicated the estimated annual amounts for stored waste referred to in the Part A permit application (Part A) do not reflect the amounts that have been received at 224-T TRUSAF. Mr. J. Williams Jr. (WHC) explained the maximum capacity allowed for stored waste is defined in the process design capacity in the Part A, and that amount may not be exceeded. The estimated annual amounts are estimates only, and they may be exceeded for periods of time less than a year as long as they remain within the limits of the process design capacity as averaged on an annual basis. Ms. Huckaby noted that she had reviewed the estimated annual amounts from the 1990 biannual reports, and a discrepancy existed between some of the annual estimates and the amounts actually received. Mr. Williams agreed to review the estimates for the past three years and adjust the numbers for the waste codes that have received higher amounts than estimated. Mr. Williams stated that it would take approximately six months to revise the Part A including review and certification processes. It was agreed to share drafts of the Part A during the revision process.

Ms. Huckaby pointed out that the certification form in the Part A permit application does not correspond with the certification language contained in the Washington Administrative Code (WAC). Mr. Williams explained that in 1987, Ecology had requested that RL/WHC set up a secondary certification form to include two signatures (DOE's and WHC's) since WHC is considered a co-operator with DOE. Mr. R. Bowman (WHC) stated that the WAC has a specific certification statement that is used in the Part B permit application. Mr. Bowman indicated that WHC would take an action to provide Ms. Huckaby the letter documenting approval by Ecology and EPA for the certification form used for the Part A.

- **Sealing Floor at the 224-T TRUSAF**

Mr. K. McDonald (WHC) reported that WHC had made the decision not to remove the existing lead-based paint from the floor. Instead, the floor will be coated with an epoxy sealant, which will provide

secondary containment of the building. Ms. Huckaby asked if an evaluation will be performed to determine compatibility of the sealant with the material on the floor. Mr. McDonald responded that there is an ongoing process of evaluation to determine compatibility. Mr. McDonald stated the chosen sealant, Dudick, a two part epoxy sealant, is similar to Steelcote, the sealant used at the Central Waste Complex. Mr. McDonald stated that Steelcote outperforms Dudick with regards to temperature, but that Dudick outperforms Steelcote with regards to permeability. Mr. Duncan noted that WHC had initially proposed to remove the existing paint from the floor, and inquired about the rationale for the decision to not remove the paint. Mr. McDonald stated there was a concern that airborne particulates would be generated by the process of sanding and removing the paint. Mr. Szelmeczka added that any loose material on the floor will be removed before it is painted, and that WHC had been assured by the vendor of adequate performance of the epoxy sealant when applying it over the existing paint. Ms. Huckaby stated that if air emissions increase while the floor is being sealed, Mr. A. Conklin from the Department of Health would like to be contacted. Mr. McDonald stated that there is no plan to increase the airflow at the 224-T TRUSAF while the floor is being sealed because the 224-T TRUSAF already receives nine air changes an hour, which is more than sufficient.

- **Backlog Waste at the 224-T TRUSAF**

  Mr. Saueressig noted that at the time the permit application was written, WHC did not know that backlog waste would be processed at TRUSAF; consequently it was not included in the permit. Ms. Huckaby stated she will be writing a NOD requesting a description of current activities at TRUSAF, including the backlog waste, TRU retrieved waste, and descriptions of the management of waste that doesn't certify or raises concerns after assaying or x-raying.

- **Seismic Upgrades and Piping Under the Unit**

  Mr. Saueressig stated when TRUSAF was upgraded for seismic considerations, some of the piping running under the facility was cut and capped and left in place. Ms. Huckaby noted that the cutting and capping of the pipes was not documented in the Part B permit.

  Ms. Huckaby proceeded to list several items she would be requesting, including: capacity calculations; drawings identifying the slope of the floor; the first floor drain diagrams; sealing documentation related to the floor drains and piping connected to the process cells; and drawing Nos. W-72500, H-2-4451, H-2-36396, HWS-9082, FCN-0495, HW-23043.

- **Process Cells in the 224-T TRUSAF**

  Ms. Huckaby requested a copy of the flow sheets and flow diagrams (dated 12-17-51) of the precipitation separation process that may have occurred in the process cells, noting that the process cells are not included in the Part B permit application. Mr. Bowman pointed out that the portion of the building that contains the process cells was specifically excluded from the Part B since it is not part of the treatment, storage and disposal (TSD) unit that is being utilized. Ms. Huckaby indicated she will consider the process cells as part of the unit until it is demonstrated that active storage of dangerous or mixed waste is not occurring in the process cells.

  A discussion ensued regarding the exclusion of the process cells from the Part B permit application. Mr. Duncan suggested that the parties refer to the definition of the facility in the Tri-Party Agreement (TPA) to determine if the process cells were included as part of the facility, and whether they are considered a RCRA or CERCLA unit. Mr. Duncan suggested looking at the action plan in the TPA to find out how the process cells are listed, as a RCRA past practice unit or a CERCLA past practice unit. Mr. Duncan stated that if the process cells are a CERCLA past practice unit, they need to be trace to an operable unit , which would get them out of RCRA regulations. Mr. Duncan stated that if the process cells are not identified anywhere in the TPA then theres a problem. Mr. Bowman stated that WHC will take an action to determine the status of the process cells and provide the information at the Unit Managers Meeting.

  At this point in the meeting, Ms. Huckaby expressed a concern with processing the information she had requested at the meeting, and indicated she would probably request an extension for her review of the NOD response table.

5. Set Next Meeting Date

The next Unit Managers Meeting was scheduled for videoconference on December 16, 1993, from 10 a.m. to 12 p.m.

Attachment 3

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Video Conference Room (784-B)
Federal Building
Richland, Washington

November 4, 1993
2:30 p.m. - 4:30 p.m.

Attendance List

Name	Organization	Phone #
Joan K. Bartz	MACTEC	(509) 946-3693
Roger C. Bowman	WHC	(509) 376-4876
Dan L. Duncan	EPA	(206) 553-6693
Alisa D. Huckaby	Ecology	(509) 736-3034
Kathy E. Knox	WHC	(509) 372-3596
Steve J. Lijek	MACTEC	(509) 946-3683
Kent M. McDonald	WHC	(509) 373-4981
Dan G. Saueressig	WHC	(509) 376-9739
Roger W. Szelmeczka	WHC	(509) 373-4200
Joel F. Williams Jr.	WHC	(509) 376-4782

Attachment 4

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
Video Conference Room (784-B)
Federal Building
Richland, Washington

November 4, 1993
2:30 p.m. - 4:30 p.m.

Action Items

Action Item #	Description
11-4-93:1	WHC will provide an overview of the TRU retrieval pilot project at the next UMM. Action: R. Szelmeczka (WHC)
11-4-93:2	WHC will compare the estimated annual quantities for stored waste with the amounts that have been stored for the past three years, and adjust the estimates in the Part A permit application that need to be increased. Action: J. Williams Jr. (WHC)
11-4-93:3	WHC will provide the letter documenting approval by Ecology and the EPA for the certification form used for the Part A permit application. Action: J. Williams Jr. (WHC)
11-4-93:4	WHC will determine the status per the TPA of the process cells at TRUSAF and provide the information at the Unit Managers Meeting. Action: R. Bowman (WHC)

Attachment 5

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY
Unit Managers Meeting
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Richland, Washington

November 4, 1993
2:30 p.m. - 4:30 p.m.

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY (224-T TRUSAF) CONTAINER MANAGEMENT PRACTICES

224-T TRANSURANIC WASTE STORAGE AND ASSAY FACILITY

(224-T TRUSAF)

Container Management Practices

October 27, 1993

GENERAL

- The 224-T TRUSAF can receive and store transuranic (TRU), transuranic mixed (TRU-MW), and low-level mixed (LL-MW) waste generated on and off the Hanford Facility in U.S. Department of Transportation approved containers
  - All TRU-MW and LL-MW containers must be packaged according to Hanford Facility waste acceptance criteria
- Generators of waste being shipped to the 224-T TRUSAF are responsible for completely identifying the dangerous constituents of their waste
- Based on the information received from the generator, the Generator and Waste Acceptance Services (GWAS) organization designates the waste in accordance with the Washington Administrative Code (WAC) 173-303-070 and 40 Code of Federal Regulations (CFR) Part 261

GENERATOR DISPOSAL REQUEST

- Generators wanting to store waste at the 224-T TRUSAF must submit a written request to the GWAS organization describing the waste for evaluation. These requests must by accompanied by a physical, radiological, and chemical description of the waste
  - It is the responsibility of the generator to completely and correctly identify the dangerous constituents of their waste
- The GWAS organization evaluates this information and designates the waste in accordance with the WAC 173-303-070 and 40 CFR 261
- The nature, component, and dangerous constituents of the waste generally are known through process knowledge (i.e., lab reports, MSDSs, etc.,). In cases where the information submitted to the GWAS organization is inadequate, the GWAS organization prescribes sampling and analytical testing methods for the generator to properly characterize the dangerous constituents in the waste before accepting the waste for storage at the 224-T TRUSAF

GENERATOR DISPOSAL REQUEST (Cont'd)

- If the information submitted by the generator is complete and accurate, the GWAS organization provides the generator written notification of approval to store the waste at the 224-T TRUSAF; waste treatment, packaging, and labeling requirements; and a storage approval number. The GWAS organization also will provide storage and/or disposal and handling information to the 224-T TRUSAF operations personnel

WASTE ACCEPTANCE

- On receipt of waste by 224-T TRUSAF personnel, a visual inspection for container condition, container seal, and proper marking and labeling is performed before the waste can be off-loaded from the truck. The following forms also are received from the driver and the signatures verified:
  - Radioactive shipment record (TRU and TRU-MW only)
  - Transuranic waste storage record (TRU and TRU-MW only)
  - WIPP certification checklist (TRU and TRU-MW only)
  - Contents inventory sheet
  - Uniform hazardous waste manifest for waste received from offsite (TRU-MW and LL-MW only)
  - Waste tracking forms for waste received from onsite (TRU, TRU-MW, and LL-MW)

WASTE ACCEPTANCE (Cont'd)

- If inspection of the waste container(s) and accompanying documentation reveals any discrepancies, these discrepancies are resolved by the 224-T TRUSAF operations personnel, the GWAS organization, and the generator before the waste is accepted for storage
- Once the waste has been accepted for storage, the waste may be off-loaded and moved to the receiving and temporary storage areas (Figure 1)
  - Waste containers being off-loaded from a truck are done over a concrete pad and into portable secondary containment until the containers can be administratively processed
- Data packages are placed on each container in the temporary storage area that shows its progress through the storage process
  - Package Identification Numbers are placed on each data package and the associated container to aid in data package/container tracking

PROCESSING AND STORAGE

- Administratively processing containers at the 224-T TRUSAF requires the containers to be assayed to determine the fissile isotope content (to determine if the waste is TRU or LL waste), and x-rayed to verify the absence of prohibited items (e.g., free liquids)
  - In all cases, the waste is dry with some allowance for residual liquids in small containers within the waste matrix. Free liquids will be solidified, absorbed, or otherwise bound in the waste matrix by inert materials before shipment to the 224-T TRUSAF
- Portable secondary containment is provided for all incoming waste containers until the absence of free liquids is verified. Portable secondary containment systems are used to store all containers determined to have free liquids and/or waste determined to include dangerous waste codes F020, F021, F022, F023, F026, and F027

FINAL DISPOSITION

- Once the containers have been administratively processed, they are taken to their assigned storage modules (Figures 1, 2, and 3)
  - Containers are moved with a manual forklift with a specially designed container-lifting device
- Containers are stored in modules, following marked patterns on the floor
  - Containers can be stacked in storage modules two containers high. Plywood is placed between stacks to ensure level stacking and ease of movement
  - A minimum 36-inch aisle space is maintained between rows of mixed waste containers as required by WAC 173-303-630(5)(c)
- Once the container has reached its final storage location, the data package placed with the container in the temporary storage area is removed for filing in the operations office

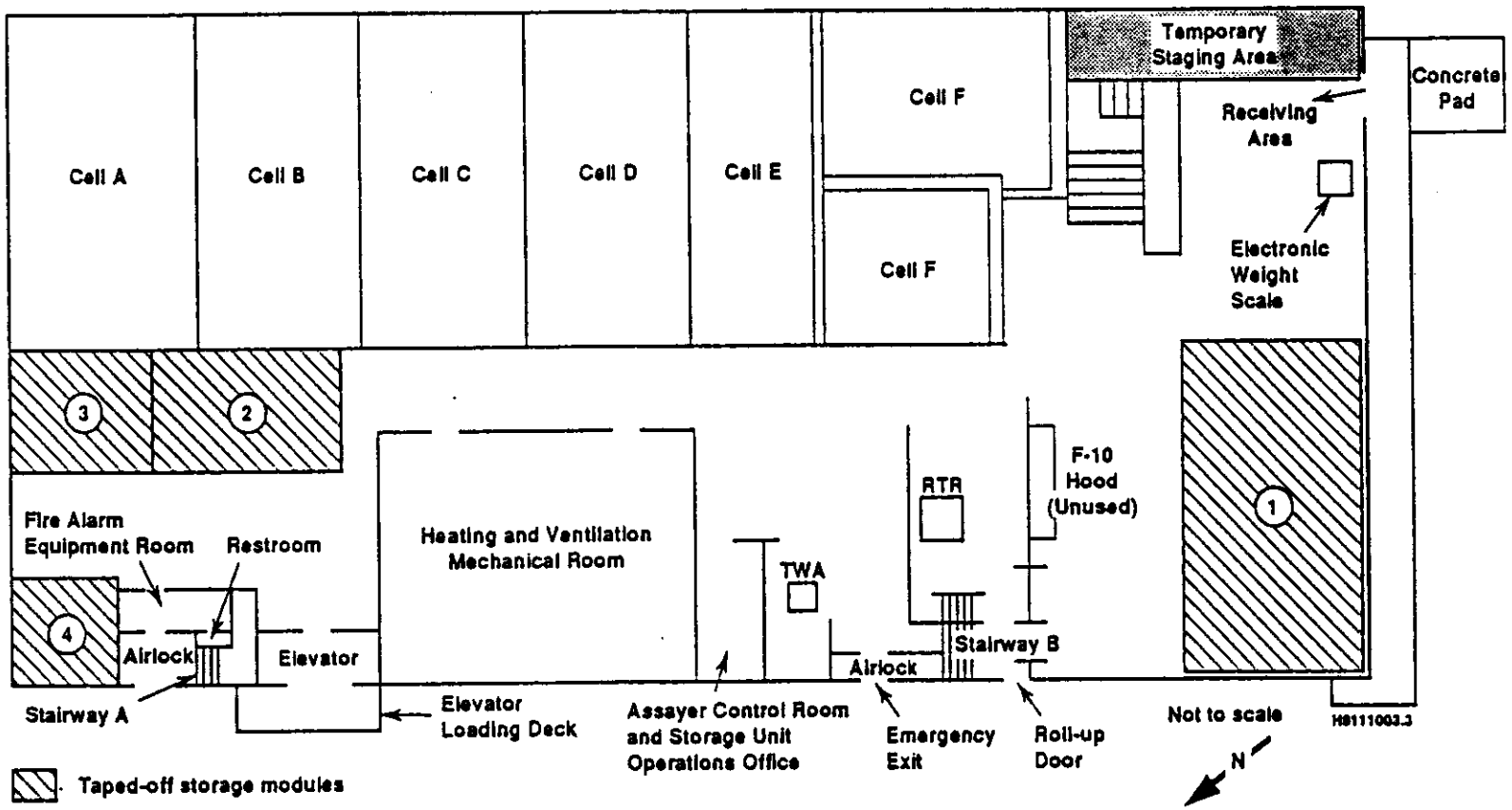
FINAL DISPOSITION (Cont'd)

- **The following information is maintained at the 224-T TRUSAF for each waste type stored at the facility:**
  - **All records providing a description of the waste**
  - **Documentation identifying the dangerous characteristics of the waste**
  - **The basis for waste designation**
  - **Laboratory reports with chemical, biological, physical analysis of samples**
  - **Onsite waste tracking forms and manifests**
  - **Land disposal restriction documentation**

OVERSIGHT AND CERTIFICATION

- The Special Disposal Operation organization performs assessment programs for generators to certify that they adequately characterize and quantify the waste being shipped to the 224-T TRUSAF
- The assessment program consists of initial assessments and scheduled follow-up assessments for generators shipping waste to the 224-T TRUSAF
  - The initial assessment is conducted to certify that new generators meet the waste acceptance requirements at the 224-T TRUSAF. It is also conducted to certify that new generators meet the Hanford Facility waste acceptance criteria
  - Follow-up assessments are conducted to ensure that the generators are continuing to meet the waste acceptance criteria
- Assessments are scheduled annually, but may vary depending on the amount of discrepancies found in previous storage requests, the amount of waste shipments made by a generator annually, and the complexity of the waste streams being generated

Figure 1. 224-T TRUSAF First Floor Layout



Taped-off storage modules

TWA = transuranic waste assayer.

RTR = real-time radiography x-ray system.

Notes: Storage modules are not enclosed rooms.

Refer to Drawing H-2-71704 in Appendix 4A for detailed building layout.

Storage modules (flexible in size):

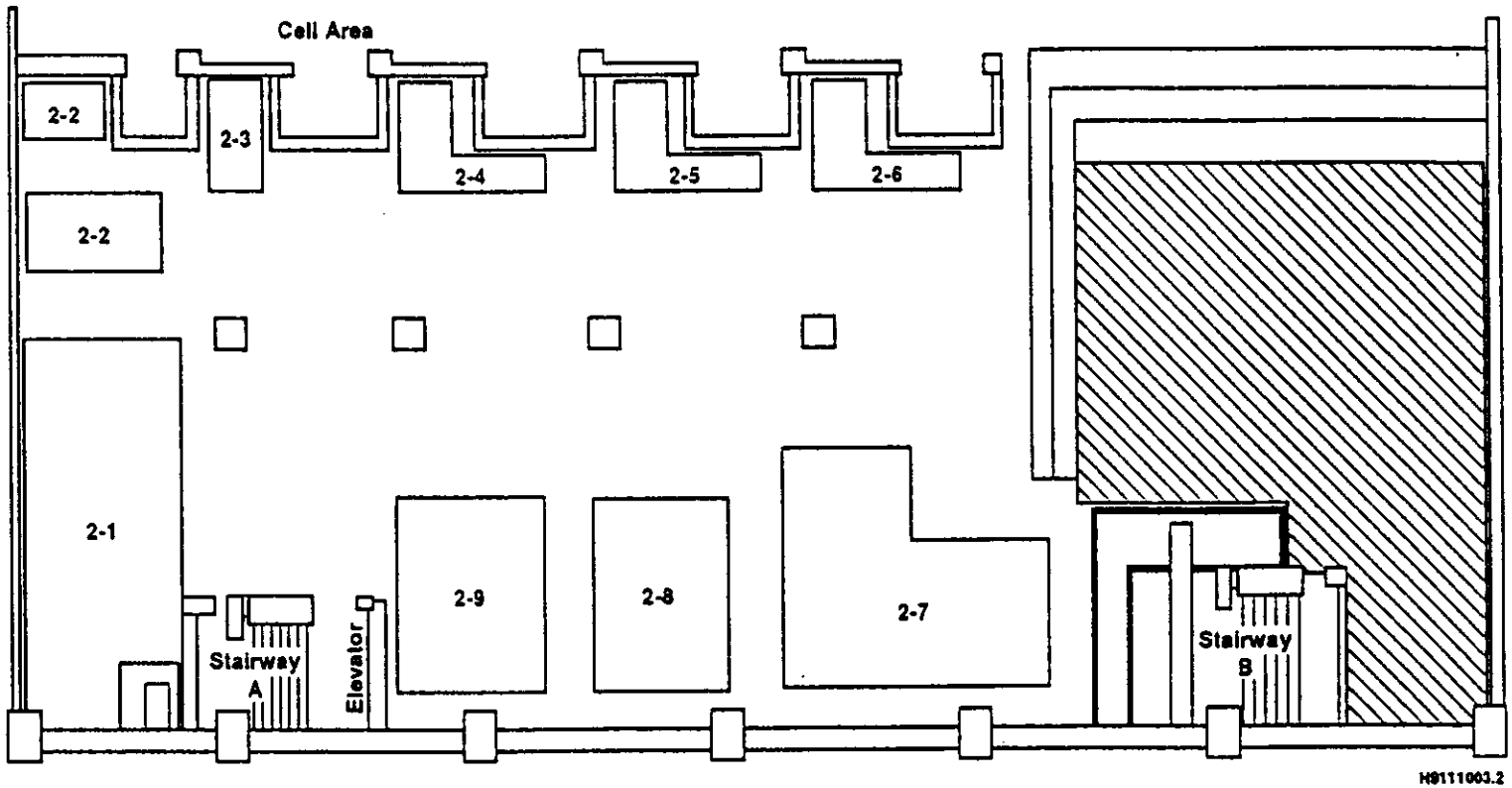
(1) Transuranic mixed waste initial storage

(2) Transuranic waste to go upstairs

(3) Low-level waste

(4) Return to offsite generator or onsite generating unit

Figure 2. 224-T TRUSAF Second Floor Layout



Not to Scale

N

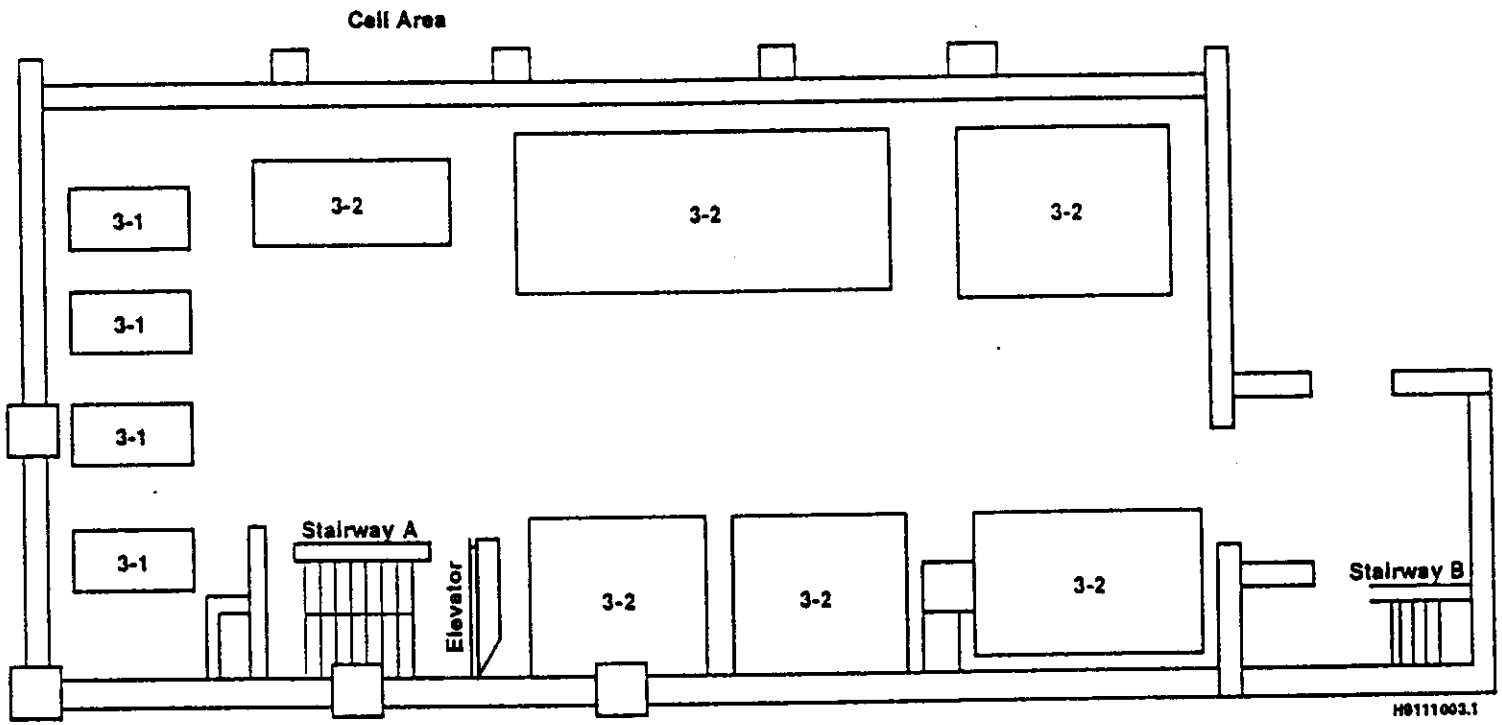
Storage Modules

Modules 2-1, 2-3, 2-4, 2-5, 2-6, 2-7, 2-8, and 2-9 are presently for transuranic waste.
Modules 2-2 are for transuranic mixed waste (acids).

Transuranic mixed waste as designated by supervisor.

Note: Storage module locations are adjusted as necessary.

Figure 3. 224-T TRUSAF Third Floor Layout



Storage Modules

Not to Scale

N

Modules 3-1 are for transuranic mixed waste (caustic and others).
Modules 3-2 are presently for transuranic waste.

Note: Storage module locations are adjusted as necessary.